

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA CARLSON	:	CIVIL ACTION
	:	
<i>Plaintiff,</i>	:	
v.	:	
	:	
QUALTEK WIRELESS, LLC	:	NO. 2:22-CV-00125
	:	
<i>Defendant.</i>	:	JURY TRIAL DEMANDED
	:	

DEFENDANT, QUALTEK WIRELESS, LLC'S EXHIBIT LIST

Defendant, QualTek Wireless, LLC ("QW"), by and through its undersigned counsel, respectfully submit the following exhibit list pursuant to this Court's Scheduling Order dated March 29, 2022 [Doc. No. 18]¹:

EXHIBITS THAT DEFENDANT EXPECTS TO OFFER AT TRIAL			
<u>EX. NO.</u>	<u>DATE</u>	<u>BATES NO./DOC IDENTIFIER</u> (where applicable)	<u>DESCRIPTION</u>
D001	3/27/22	ECF No. 12	Plaintiff's First Amended Complaint
D002	4/15/20	CARSLON DISCOVERY 000030-000034	EEOC Charge of Discrimination with Addendum
D003	8/16/21	CARSLON DISCOVERY 000001-000002	EEOC Determination
D004	3/2/20	CARSLON DISCOVERY 000024-000034	Director of Finance in King of Prussia, PA at Qualtek, Job Posting and Description
D005	July 2019	Qualtek00185-Qualtek00186	Empire Telecom, LLC Director of Finance Job Description
D006	Undated	Qualtek00439-Qualtek00442	Director Degree List 2017-2020
D007	11/19/17	Qualtek00221-Qualtek00222	Employment Offer Letter to Plaintiff
D008	Undated	Qualtek00193-Qualtek00194	Plaintiff's Resume

¹ Due to QW's pending motion for summary judgment that may impact the issues at trial, QW reserves the right to supplement this list.

EXHIBITS THAT DEFENDANT EXPECTS TO OFFER AT TRIAL			
<u>EX. NO.</u>	<u>DATE</u>	<u>BATES NO./DOC IDENTIFIER</u> (where applicable)	<u>DESCRIPTION</u>
D009	3/30/18	Qualtek00238	Revised Offer Letter of Employment to Plaintiff
D010	1/29/18	Qualtek00391-Qualtek00415	Relevant Portions of B. Neff's Personnel File
D011	6/30/22	Qualtek00417-Qualtek00418	Salary Timeline Records for Plaintiff and B. Neff
D012	9/11/19	Qualtek00368-Qualtek 00390	Relevant Portions of B. Ebeling's Personnel File
D013	12/3/19	Qualtek00188-Qualtek 00192	Email string with Plaintiff and M. Web re: Application – Director of Finance
D014	1/24/20	Qualtek00199	Meeting Summary of Human Resources Discussion with Plaintiff
D015	1/31/20	Qualtek00205-Qualtek00206	D. Conn email re: Wireless Corporate Restructure
D016	2/13/20	Qualtek00240-Qualtek00246	Collection of Emails re: King of Prussia
D017	1/27/20	Qualtek00197-Qualtek00198	Email string with S. Trybula, Plaintiff, D. Conn and S. Kemmerer re: Bonus Issue
D018	4/1/18	Qualtek00416	Personnel Action Notice (PAN) for Plaintiff submitted by J. Busky
D019	1/31/20	Qualtek00210-Qualtek00214	Plaintiff's Severance Agreement and General Release
D020	Jan. 2019	Qualtek00001-Qualtek00160	Qualtek Employee Handbook
D021	6/30/20	Qualtek00173-Qualtek00177	Chart of Salaries and Bonuses for Finance Employees
D022	2/12/20	Qualtek00215	Plaintiff's Termination Report
D023	12/1/17	Qualtek00217-Qualtek00239	Plaintiff's Personnel File
D024	7/12/22	ECF No. 27-4 at 457–462	Relevant Portions of QualTek Website
D025	2018	Qualtek00419-Qualtek00432	Plaintiff's 2018 Performance Reviews
D026	1/12/20	Qualtek00433-Qualtek00438	Plaintiff's 2019 Performance Review

FOX ROTHSCHILD LLP

By: /s/ Colin D. Dougherty

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Dated: July 28, 2022

Attorneys for Defendant

CERTIFICATE OF SERVICE

I, COLIN D. DOUGHERTY, hereby certify that, on this date, I served the foregoing document upon Plaintiff's counsel via electronic mail.

Dated: July 28, 2022

By: /s/ Colin D. Dougherty
COLIN D. DOUGHERTY